

**From:** Sierra Landholm <sierra@freemanlawfirm.org>  
**Sent:** Friday, March 5, 2021 3:46 PM  
**To:** WAWDdb\_NewCasesTac  
**Cc:** Spencer Freeman  
**Subject:** Request for Issuance of DMCA Subpoena to Tonic Domains Corporation  
**Attachments:** Ltr to Ct Clerk re DMCA Subpoena .pdf; Prop'd DMCA SDT Tonic.pdf; Dec ISO DMCA SDT to TONIC (Final)\_Signed.pdf

**CAUTION - EXTERNAL:**

TO: Clerk of the United States District Court, Western District of Washington

This office represents MG Premium Ltd ("MG") in its request for issuance of a Subpoena to service provider Tonic Domains Corporation. ("Tonic") pursuant to U.S.C. § 512(h) ("DMCA Subpoena"). The DMCA Subpoena requests the identification of infringers of MG's copyrighted material posted on "[freeomovie.to](http://freeomovie.to); [gaypornhdfree.to](http://gaypornhdfree.to); [goodporn.to](http://goodporn.to); [letsjerk.to](http://letsjerk.to); [xtapes.to](http://xtapes.to); and [yespornplease.to](http://yespornplease.to) ."

To this end, the following documents are attached pursuant to the statute's requirements to enable the Clerk to issue such Subpoena:

- Letter requesting the Clerk's issuance of the DMCA Subpoena;
- Proposed DMCA Subpoena to Cloudflare, Inc.; and,
- Sworn Declaration of Andreas Alkiviades Andreou in support of the DMCA Subpoena.

Copies of the notifications issued under 17 U.S.C. § 512(c)(3)(A) to the DMCA Agent for Cloudflare are attached to both the Subpoena and Declaration. We believe the materials submitted herewith will enable you to issue the requested DMCA Subpoena.

We will pay the filing fee on ECF.

Thank you in advance for your assistant in this matter.

*Cordially,*

*Sierra Landholm*

*Paralegal*

Freeman Law Firm, Inc.

1107 ½ Tacoma Avenue South

Tacoma, Washington 98402

253.383.4500

253.383.4501 (fax)

[sierra@freemanlawfirm.org](mailto:sierra@freemanlawfirm.org)

CONFIDENTIALITY NOTICE: This e-mail message and any attachments may contain confidential information generated by the Freeman Law Firm, Inc. that is legally protected by the attorney-client, work product and/or other privileges. If you are not a designated or intended recipient on the email, please send a reply email or call 253-383-4500 to notify the sender of the error in transmission, and delete the message and any copies without reviewing or disclosing its contents.

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.